UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

In re) Chapter 9
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
Debtor.) Hon. Steven W. Rhodes
))

CERTIFICATE OF NO RESPONSE OR OBJECTION REGARDING JOINT MOTION OF APPELLANTS AND APPELLEE TO STAY APPEAL

On September 18, 2014, Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (collectively "Syncora") and the City filed the Joint Motion of Appellants and Appellees to Stay Appeal [Docket No. 7568] (the "Motion") with this Court and served it on the parties identified in the Certificate of Service attached to the Motion and attached hereto as Exhibit A. Attached as Exhibit 2 to the Motion was a Notice of Hearing identifying October 2, 2014, as the deadline for objections to the Motion (the "Objection Deadline"). A copy of the Notice of Hearing is attached hereto as Exhibit B.

No response or objection to the Motion was filed with the Court by the Objection Deadline. Accordingly, pursuant to Rule 9014-1(c) of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Eastern District

of Michigan, Syncora and the City respectfully request that the Court enter a final order in the form attached hereto as Exhibit C.

Dated: October 16, 2014 Respectfully submitted,

KIRKLAND & ELLIS LLP

By:/s/ Ryan Blaine Bennett

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070 Facsimile: (248) 646-5075

Attorneys for Syncora Guarantee Inc. and

Syncora Capital Assurance Inc.

/s/ Corinne Ball

Corinne Ball (NY 1125186) JONES DAY 222 East 41st Street New York, New York 10017 Telephone: (212) 326-3939 Facsimile: (212) 755-7306

cball@jonesday.com

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
JONES DAY
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

Robert S. Hertzberg (P30261) Deborah Kovsky-Apap (P68258) PEPPER HAMILTON LLP 4000 Town Center, Suite 1800 Southfield, MI 48075 Telephone: (248) 359-7300 Facsimile: (248) 359-7700 hertzbergr@pepperlaw.com kovskyd@pepperlaw.com

Attorneys for the City of Detroit